

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOE,)	
)	Case No: 7:21-CV-03193-JD
Plaintiff,)	
)	
vs.)	LIMESTONE UNIVERSITY f/k/a
)	LIMESTONE COLLEGE'S RESPONSE
LIMESTONE UNIVERSITY F/K/A)	TO LR 26.01 INTERROGATORIES
LIMESTONE COLLEGE, COLLINS)	
MURPHY, MG FREESITES, LTD., d/b/a)	(Jury Trial Demanded)
PORNHUB.COM and HAMMY MEDIA)	
LTD. d/b/a XHAMSTER.COM,)	
)	
Defendants.)	

Defendant **LIMESTONE UNIVERSITY f/k/a LIMESTONE COLLEGE** responds to those interrogatories required to be answered under Local Civ. Rule 26.01 (D.S.C) as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Jury, as this Defendant is entitled to trial by jury in this personal injury action.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: This Defendant is not a publicly owned company. 1) None. 2) None. 3) None.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

RESPONSE: This Defendant is not challenging the appropriateness of the division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

1. **RESPONSE: (1) Jane Does 1-9 v. Limestone College, et al. Case No.: 7:20-CV-00947-JD; Alexandra Chappell Arnette, et al v. Limestone College, et al. Case No.: 7:20-cv-04260-JD**
2. **(2) Both cases originate from similar factual allegations against Collins Murphy and Limestone University f/k/a Limestone College.**
3. **(3) In Case No. 7:20-CV-00947-JD, the Amended Consent Scheduling has a current discovery deadline of October 24, 2022, an ADR deadline of July 1, 2022, and trial not before November 30, 2022. In Case No. 7:20-cv-04260-JD, the Amended Consent Scheduling has a current discovery and mediation deadline of June 29, 2022, with trial not before September 9, 2022.**

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: This Defendant is properly identified in the caption as Limestone University but is improperly identified as “Limestone College” in the substance of Plaintiff’s Amended Complaint. Defendant’s proper legal name is “Limestone University.” Counsel will accept service of an amended summons and pleading reflecting the correct identification.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: Defendant Limestone denies any liability to Plaintiffs. Defendant Limestone contends that Defendant Collins Murphy is liable to Defendant Limestone for costs, attorneys’ fees, and any judgment rendered against Defendant Limestone in favor of Plaintiffs. In addition, Defendant Limestone contends that Defendant Collins Murphy is liable to it for damages to Defendant Limestone’s reputation and other economic and noneconomic, nominal, consequential, compensatory, exemplary, and other damages as may be proved at trial.

Defendant Collins Murphy was Defendant Limestone’s employee during relevant periods, as reflected in the Plaintiffs’ Amended Complaint and further detailed in Defendant Limestone’s Answer and Cross-claims. Plaintiffs’ claims against Defendant Limestone are based on *respondeat superior* liability for Defendant Murphy’s actions, and Defendant Limestone’s alleged negligent hiring/supervision. Defendant Limestone contends that it was not negligent in hiring or supervising Defendant Collins Murphy and

that Defendant Collins Murphy acted outside of the course and scope of his employment in all wrongdoing committed against Plaintiffs leaving him liable to Limestone and to Plaintiffs for those actions.

Defendant Limestone does not at this time contend that any other person or legal entity not named in the caption of this Case is liable to Plaintiffs but reserves its right to amend this response through the course of this Case with regard to other persons or entities that it may learn have liability to Plaintiffs.

This 29th day of April, 2022.

RAHIMI, HUGHES & PADGETT, LLC

/s/ JOSEPH Y. RAHIMI II
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CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing **LIMESTONE UNIVERSITY f/k/a LIMESTONE COLLEGE'S ANSWERS TO RULE 26.01 INTERROGATORIES** has been served on counsel for all parties by placing same in the United States Mail in a properly addressed envelope with sufficient postage affixed thereon and/or via electronic mail to all other counsel of record to ensure delivery to:

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This 29th day of April, 2022.

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